

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

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INTERNATIONAL LONGSHOREMEN’S	:	
ASSOCIATION, LOCAL 333, <i>et al.</i> ,	:	
	:	Case No. 15-2499
Plaintiffs,	:	
	:	
vs.	:	
	:	
INTERNATIONAL LONGSHOREMEN’S	:	
ASSOCIATION, AFL-CIO, <i>et al.</i> ,	:	
	:	
Defendants.	:	
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CONSENT MOTION FOR EXTENSION OF BRIEFING DEADLINE

Appellees International Longshoremen’s Association, AFL-CIO, Harold J. Daggett, Benny Holland, Jr., Stephen Knott, Gerald Owens, and John D. Baker, by and through their undersigned counsel, hereby move and request with the consent of Bruce M. Luchansky, Esq., counsel for Appellants, and Michael Collins, counsel for Appellee Steamship Trade Association (“STA”) for an order extending all Appellees’ deadline for filing their response briefs from February 25, 2016 until March 3, 2016, for the following reasons:

1. On December 2, 2015, the Appellants filed their notice of appeal.
2. On January 20, 2016, the Appellants filed their opening brief and the joint appendix.
3. The Appellees’ response briefs are currently due on February 25, 2016.
4. In light of other deadlines and professional obligations, counsel to Appellees sought consent from counsel for Appellants and counsel for STA to request an extension of time

from this Court to file the Appellees' response briefs. Counsel for Appellants and counsel for STA agreed to an extension for all Appellees to file their response briefs by March 3, 2016.

WHEREFORE, the moving Appellees request that this Court enter an order extending the time in which all the Appellees may file their response briefs to March 3, 2016.

Dated: February 12, 2016

Respectfully submitted,

/s/John P. Sheridan

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*Attorneys for Appellees International
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Harold J. Daggett, Stephen Knott, Gerald
Owens, Benny Holland, and John D. Baker*

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing were served on this 12th day of February, 2016, via the Court's CM/ECF system on the all counsel of record

/s/ John P. Sheridan

John P. Sheridan